

\_\_\_\_\_<sup>x</sup>  
GEORGE KARKANIAS, 08 Civ. 1967(Scheindlin,J.)(Peck, M.J.)

Plaintiffs,

**AUTOMATIC DISCLOSURE  
STATEMENT**

v.

ALBERT EINSTEIN COLLEGE OF MEDICINE  
OF YESHIVA UNIVERSITY; AND YESHIVA  
UNIVERSITY,

Defendants.

\_\_\_\_\_<sup>x</sup>

Plaintiff George Karkanias, Ph.D., by his attorneys Cox Padmore Skolnik & Shakarchy  
LLP, hereby submits the following automatic disclosures as required under Fed. R. Civ. P. 26:

**Disclosure 1(a) Identify the name and address of all persons with discoverable information  
respecting claims, defenses and damages.**

Yeshiva University/AECOM Employees:

Anne Etgen, Ph.D  
Minority Affairs Director

Donald Faber  
Neuroscience Department Chairman

Dr. Todd R. Evans  
Assistant Dean for Graduate Studies.

Michael Prystowsky  
Department of Pathology Chairman

Yeshiva University/AECOM Employees (con't):

Dean Purpura  
Dean of the Medical College

Dr. Jimmy David

Ed Burns  
AECOM Dean

Nancy Markey  
Human Resources/Affirmative action department

John L. Harb  
Assistant Dean for Scientific Operations

Peter Werner, Ph.D.  
AECOM associate professor

Luciano Rossetti, Ph.D.  
tenured and endowed professor

Dr. Ilona Vathy

Alexia Pakiels

Sal Manna

Zaven Kaprielian. Ph.D.

Richard Kosman

Other Witnesses

Eliot Garner, Ph.D. *see* K00250

Dr. Richard De La Garza II, Ph.D. *see* K00237

Richard M. Fleuridor, Ph.D. *see* K00292

Arnulfo Quesada, Ph.D. *see* K00335

Oksana Hnatzuk, Ph.D.

Jeannie Fiber, Ph.D. *see* K00316

Mr. John Liburd

Other Potential Witnesses:

Dr. Cyndra Xinheliu *see* K00331

J.C. Morales, Ph.D. *see* K00296

Jacki Esperanza

Naquait Pearson  
10 Woodwaye Rd  
Plainview, NY 11803

Additional Potential Witnesses *see* K00328-29; K00386-87; K00389

**Disclosure 1(b) General description of all documents in the custody and control of a party relevant to the claims and defenses herein.**

Plaintiff herewith automatically produces the following documents identified by Bates Stamp numbers K00001 through K01088, subject to the attorney-client privilege, which plaintiff reserves, and does not waive. Pursuant to the attorney-client privilege, plaintiff has redacted a portion of pages herein automatically disclosed to the defense. The affected pages are identified by Bates Stamp numbers K00255; K00274-76; K00300; K00329; K00387; and K00389-90.

**Disclosure1(c) A computation of damages, including materials on which the computation is based, including materials bearing on the nature and extent of injuries suffered.**

Damages will be determined at a trial by jury.

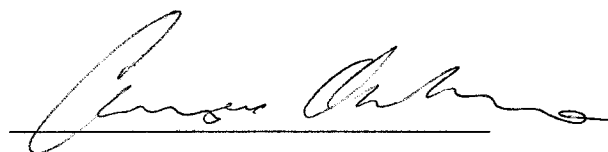
**Disclosure 1(d) Contents of any insurance agreements under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered into the action or to indemnify or reimburse for payments made to satisfy the judgment.**

None.

Plaintiff reserves the right to supplement the foregoing responses as necessary and appropriate.

DATED: New York, NY  
April 7, 2008

COX PADMORE SKOLNIK & SHAKARCHY, LLP  
Attorneys for Dr. George Karkanias

A handwritten signature in black ink, appearing to read "Chinyere Okoronkwo", is written over a horizontal line.

By: Chinyere Okoronkwo, Esq. (CO3349)  
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